

Honorable Robert S. Lasnik



MAY 17 2018

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

Defendant
Jeremy Reeves

Civil Action No. 17-CV-1077RSL

ME2 PRODUCTIONS, INC
(Plaintiff) David Lowe

V.

*JEREMY REEVES; and
Robert Kariuki
(Defendants)

Answer, Affirmative Defenses
& Counterclaim

Jury Trial Requested

1. Not enough information.
2. Agreed.
3. Agreed.
4. Proper venue, false allegation.
5. Not enough information or personal knowledge.
6. Not enough information or personal knowledge.
7. Not enough information or personal knowledge.
8. Not enough information or personal knowledge.

Answer, Affirmative Defense & Counterclaim
17-cv-1077RSL

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9. Not enough information or personal knowledge.
10. Not enough information or personal knowledge.
11. Not enough information or personal knowledge.
12. False. On a side note, what about this movie would imply a viewer or the movie having mature and distinct taste?
13. False. Not enough information or personal knowledge.
14. False. On side note, Plaintiff will claim using google maps is an investigation and proof he deserves lawyer fees of \$500 an hour.
15. False. Plaintiff conducted no investigation.
16. Not enough information or personal knowledge.
17. Not enough information or personal knowledge.
18. Not enough information or personal knowledge.
19. Not enough information or personal knowledge.
20. Not enough information or personal knowledge.
21. Not enough information or personal knowledge.
22. Not enough information or personal knowledge.
23. Not enough information or personal knowledge.
24. Not enough information or personal knowledge. I don't have this movie nor have I ever. I don't own an IP address, I simply pay to rent one. Comcast is the IP owner.
25. Not enough information or personal knowledge.
26. Not enough information or personal knowledge.
27. Not enough information or personal knowledge.
28. Not enough information or personal knowledge.
29. Not enough information or personal knowledge. False, I didn't agree with anyone or engage in violations. If Plaintiff feels a violation happened then he should conduct an actual investigation beyond just claiming to have looked at google maps, "geolocation", and having talked to only permanent overseas foreigners about it.

30. False, I would need to see and hire an expert to inspect the said used forensic software to view its recording or data log along with its capabilities and accuracy. If plaintiff allows this than I may agree with his statement, I will not use a foreign witness and expert to accomplish this.

31. Not enough information or personal knowledge and/or false. I would need to see and hire an expert to inspect the said used forensic software to view its recording or data log along with its capabilities and accuracy, to properly be able to agree or disagree with these statements. If plaintiff allows this than I may agree with his statement, I will not use a foreign witness and expert to accomplish this. I do know though that a hashtag is not a human viewable or decipherable item. Plaintiff can throw any set of numbers into a box, call it a hashtag, and claim it proves something. Simply having an IP address, its location and its payee/renter is not proof of a crime/infracton, much less of the infringer.

32. False. As far as I know this is all theoretical information. Plaintiff will need to provide human viewable/decipherable evidence beyond verbal theory for me to agree. Plaintiff will need to provide a copy of the forensic software used to prove his theory for my own experts to analyze for its capabilities and accuracy. I will not use foreign witness and experts to analyze his software. Simply identifying an IP address, its location, and payee is not evidence of a crime/infracton, much less of the infringer.

33. Not enough information or personal knowledge. I would need a personally hired expert and witness to analyze Plaintiffs forensic software to confirm its reliability and accuracy. If Plaintiff will agree to this I will not hire foreigners.

34. Not enough information or personal knowledge.

35. Not enough information or personal knowledge.

36. Not enough information or personal knowledge.

37. Agreed, I don't support or condone the theft of other people's property. False, I didn't take Plaintiffs movie and I don't support the idea of other people doing it either. If Plaintiff can't even provide basic proof that he movie was taken, much less of who took it, then he is doing nothing more than harassing me and ironically enough trying to steal from me while throwing a hissy fit about people supposedly stealing from him.

38. Not enough information or personal knowledge and/or false. My conduct didn't do anything because I don't have nor have ever had Plaintiffs childish, slap stick action, made for non-adults movie.

39. False. Plaintiff uses a joinder to make more money. Claims that he cares about saving defendants money and the courts time are brazen lies. The only person he is trying to save time for is whatever poor guy has to pre-draft foreign testimony and label it as his witness/expert, and the aid who hits copy and paste all day so he can claim \$500 for lawyer fees. Joinder is not a matter to me either way though, Plaintiff will legally posture and outmaneuver me under

either scenario. Joinder or not, I will rely on the jury to see past Plaintiffs legal posturing and maneuvering to decide the truth for themselves.

40. Not enough information or personal knowledge.

41. Not enough information or personal knowledge.

42. Not enough information or personal knowledge.

43. Not enough information or personal knowledge. I don't know what Plaintiff believes or is informed of. I do know though that all his witness and experts are foreigners and he continually fails to provide actual evidence of the crime he claims. He either pays these foreigners or someone who claims to be them to draft him stacks of watered down evidence and testimony, Plaintiff thinks that the longer and less typically understandable he makes these documents the more credible they become.

44. False. I didn't contribute to anyone infringing, Plaintiff provides no evidence of his baseless allegation/s outside of foreign pre drafted testimony. How are you supposed to police something that is invisible and has a range of at least 100 yards? How are you supposed to police something invisible that is still running when you are outside of its range and not present? Am I also supposed to monitor the wifi signal in every direction as it leaves my house? Plaintiff pretends monitoring your wifi is some type of legal requirement, yet he cannot and will not point toward any law that supports this notion.

45. False. How can you even indirectly violate Plaintiffs rights?

"Directly/indirectly/contributorily" is an all-encompassing way Plaintiff is trying to say "you are guilty no matter what, and I will take your money, even if I lack all evidence and credible witness/expert". This is just as silly as me saying Plaintiff is indirectly guilty of making Hawaii volcano blow up because of his pressure/weight on top the earth, its simply childish.

46. False. I have never seen, possessed, or owned Plaintiffs made for children movie, thus I have never seen this warning on his movie. Plaintiff will readily tell me and likely other defendants about the FBI warning on his movie though, and how the FBI now takes them and the situation seriously.

47. False. I never cause Plaintiff any injury. If he thinks someone has he should probably launch a real investigation and stop thinking that finding the payee of an IP rental and double checking their location on google maps "geolocation" proves anything beyond who pays for the bill of an invisible and relatively long range through the air wifi service in a population dense areas.

48. False.

49. False, I didn't commit any of the claimed acts and Plaintiff continually fails to provide evidence outside of secret software, google maps "geolocation" and absent possibly fake foreigners.

50. Agreed, only if attorney's fees are at the same rate it cost to hire a secretary to change a document title while hitting copy and paste all day. Simply placing your secretary's location in an expensive tower does not give rights to attorney fees for finger exercising the copy and paste button all day long. I would estimate each default judgement takes maybe 10 copy and paste functions to happen at Lowe Graham Jones, probably about 30 minutes of secretary pay for attorney fees sounds accurate.

Affirmative defenses

Unclean hands

Plaintiff is guilty of "unclean hands". Either the Plaintiff himself or his client and copyright holder has placed the movie on the internet. Either them or through a seemingly nonaffiliated third party, the plaintiff placed his own copyrighted material online in a fashion to make it available for download. In this fashion plaintiff then finds IP address online and claims they took the very movie he himself placed there. Much like Plaintiff I have no evidence to prove this....but I know with 100% certainty it has happened. If Plaintiff will not comply with discovery than I will pay foreign experts residing in China and Russia to hand me documents that I will then submit to the court proving Plaintiffs guilt, by attaching Plaintiffs home and work IP address in conjunction to "geolocation", this will be a substantial investigation that I cannot afford to pay American investigators and experts for, this in no way effects the credibility of the witness and testimony I will provide if needed. I will have these Russian and Chinese witness/experts hand me pre drafted testimony to prove my claims, through a hashtag that is much the same as a finger print and never duplicated, a hashtag neither visible or decipherable to the human eye or brain, my Chinese and Russian witness/experts that come at a great price to me will tie this hashtag to Plaintiff, his location, and his IP. If this was not in fact Plaintiffs hand at work then he must investigate for me free of cost and provide the actual infringer, if not then Plaintiff paying for an IP address on its own is enough for me to advance with my experts and the testimony they will most certainly produce. If Plaintiff does not comply with my discovery requests this is likely because he is guilty and attempting to hide/destroy the evidence that proves his guilt. None the less I will still have the hashtag, IP, geolocation and owner of the IP after subpoena from ISP. Through the purchase of foreign witness/expert testimony absent Plaintiffs compliance, he will be proven guilty. If the Plaintiff does not respect and believe in my Chinese and Russian investigators, witness, and experts' testimony, I hope to find out early so I can be on equal ground by saving up to hire a German one instead that can only be respected as much as Plaintiffs experts and their pre drafted paid for testimony. If plaintiff wants to see the software we use to prove his guilt that will not be possible because it is in a foreign country and is proprietary. If Plaintiff wants to question my experts and witness and their testimony that will not be possible because their testimony is rock solid, them living outside the scope of the court and questioning proves their creditability.

Unjust Enrichment

Plaintiff is guilty of "unjust enrichment". He seeks to take advantage of the legal system and copy right laws to collect off lawsuits for copyright rather than the promotion and enjoyment/enrichment of humans through the viewing of the movie.

Assumption of the risk

The Plaintiff is guilty of "assumption of the risk". Through a ghost or seemingly nonaffiliated third party Plaintiff placed his own movie on the internet. My Chinese and Russian experts (absent Plaintiffs discovery compliance) though will provide a hashtag and IP address that they say ties this action back to the Plaintiff. I am simply waiting for Plaintiffs non compliance to pay them to provide me with this unfaultable evidence and testimony, having a near zero taxable income for multiple years in a row makes saving up this money I must hand them for the evidence a long and burdensome task.

Misuse of Product

Instead of placing the movie online to profit off the proliferation of its sales, Plaintiff placed the movie online to profit off its lawsuits. This is provable by the expert and witness testimony I am saving up to purchase from Russian and Chinese subject matter experts.

Counter Claim

1. In forcing a Defendants hand in preparing for trial, substantial material cost will incur. Plaintiff if receiving losing party status at trial is liable for these costs. These costs do not include physical or mental labor time, lost wages, or time spent at trail or preparing for it. These costs include any and all material costs that would not be incurred if defendant was not forced to prepare for trial. Material cost includes any and all physical objects/substances required to prepare for trial. I am counter suing Plaintiff to recoup these loses if he surfaces as the losing party in trial. These costs are already in the 1000 dollar range but will likely reach 4000 to 8000 dollars or more after trial, depending on the level of compliance by Plaintiff in discovery. The costs of purchasing an expert witness and testimony from Russia and China will be included in a final sum total that I will provide the court with post trial in the event Plaintiff is losing party.
2. I am countersuing Plaintiff for relying on bully boy predatory tactics to fuel his settlement factory. Unless I am the only one out of many, the first thing Plaintiff brings up to defendants if he talks to them is the FBI and potential FBI investigation into them.

Plaintiff lacks all evidence and credible testimony. Because of this he aims to find defendants that cannot afford competent representation. For pennies Plaintiff buys foreign experts and witness that he then uses as leverage to bully defendants into settlement, little do these defendants know that these experts are not experts at all and their testimony was bought and is invalid. To humor Plaintiff we can pretend his paid for testimony is from real persons but we have no actual way of knowing this. At best plaintiffs experts are weak, in reality though


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we have no actual way of knowing this. At best plaintiffs experts are weak, in reality though they are likely frauds and possibly not even actual persons. Plaintiff will stand and shout all day that the world needs to stand up to applaud, salute, and respect his empty claims because he has paid foreigners labeled as experts and witnesses to claim he is right. For half the price and 2 dump truck loads worth of testimony vs. plaintiffs one, I will have stacks of watered down and long drawn out documents to hand the court and Plaintiff that will originate from foreign places that will not be questionable by any American jurisdiction.

If Plaintiff and his evidence and foreign workers were so rock solid, he would quit going after the littlest non defended claims he can find and he would take it straight to the people who will give him a big prize. He would sue McDonalds, Starbucks, Walmart, airports...etc. All these places have open wifi with no or an available password that people can download his movies from. If plaintiff was actually tracing IP address there is no possible way these places would not regularly show up in his stashed overseas software in overwhelming numbers. These places are allowing the theft of Plaintiffs movies yet he doesn't care. Plaintiff could get huge amounts from these places, the fact he doesn't even try is case in point that his case is weak at very best, he is a predator using bully tactics to seek the lowest man on the totem pole to take advantage of. For his predatory and bully boy tactics to gain an upper hand against those that will not or cannot speak for themselves, I am counter suing Plaintiff for 5,000 dollars or any other amount the court finds appropriate.

3. I am countersuing the Plaintiff for harassment. Ninety percent of Plaintiffs bird blast boiler plate grounds for relief don't even apply to me. Just about his only factual statements are my address and that I rent an IP address. If Plaintiff launched any degree of an actual investigation before filing to prosecute he would realize his allegations don't even apply and hold little to no factual content toward me. Plaintiff is walking around the room slinging buckets of gulasch at people and hoping that in combination with his bully boy intimidation tactics he can make it stick to everyone it hits. This is harassment and attempted theft by way of the legal system, plain and simple. For harassing me I am countersuing Plaintiff for 5,000 dollars or any other amount the court finds most appropriate.



5/15/2018

Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

Defendant
Jeremy Reeves

Civil Action No. 17-CV-1077RSL

Certificate of service

I certify that a true and correct copy of the foregoing document has been served to all counsel or parties of record.

Lowe Graham Jones
701 fifth avenue, suite 4800
Seattle, Washington 98104

Clerk of the Court
United States District Court for the Western District of Washington
700 Stewart Street
Seattle, WA 98101

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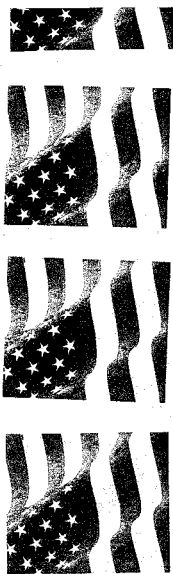
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Court Clerk

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